

EXHIBIT 14

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF INDIANA
3 INDIANAPOLIS DIVISION
4 CIVIL ACTION NO. 1:23-cv-00595-JPH-KMB
5 K.C., et al.,)
6)
7 Plaintiffs,)
8)
9 -vs-)
10)
11 THE INDIVIDUAL MEMBERS OF THE)
12 MEDICAL LICENSING BOARD OF)
13 INDIANA, in their official)
14 capacities, et al.,)
15)
16 Defendants.)
17)
18)
19)
20)
21)
22)
23)
24)
25)

REMOTE DEPOSITION OF EMILY MORRIS

The deposition upon oral examination of EMILY MORRIS, a witness produced and sworn before me, Colleen Brady, Notary Public in and for the County of Monroe, State of Indiana, taken on behalf of the Defendants, with the witness located in Indiana, on the 17th day of May 2023, at 9:26 a.m., pursuant to the Federal Rules of Civil Procedure with written notice as to time and place thereof.

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES</p> <p>2 (All appearances via videoconference)</p> <p>3 FOR THE PLAINTIFFS:</p> <p>4 Kenneth J. Falk</p> <p>5 ACLU of Indiana</p> <p>6 1031 E Washington Street</p> <p>7 Indianapolis, IN 46202</p> <p>8 317.635.4105</p> <p>9 kfalk@aclu-in.org</p> <p>10</p> <p>11 FOR THE DEFENDANTS:</p> <p>12</p> <p>13 Corrine Youngs</p> <p>14 OFFICE OF THE INDIANA ATTORNEY GENERAL</p> <p>15 302 West Washington Street</p> <p>16 IGCS, 5th Floor</p> <p>17 Indianapolis, IN 46204</p> <p>18 317.234.0276</p> <p>19 corrine.youngs@atg.in.gov</p> <p>20</p> <p>21 ALSO PRESENT:</p> <p>22 Dewey Nelson, concierge tech</p> <p>23 Harper Seldin, counsel for plaintiffs</p> <p>24 Gavin Rose, counsel for plaintiffs</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 INDEX OF EXHIBITS</p> <p>2 Page</p> <p>3 Deposition Exhibit No.:</p> <p>4 Exhibit 1 - Notice of deposition 7</p> <p>5 Exhibit 2 - Complaint 8</p> <p>6 Exhibit 3 - Declaration of Emily Morris 10</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 3</p> <p>1 INDEX OF EXAMINATION</p> <p>2 Page</p> <p>3 DIRECT EXAMINATION 5</p> <p>4 Questions by Corrine Youngs</p> <p>5 CROSS-EXAMINATION 50</p> <p>6 Questions by Kenneth J. Falk</p> <p>7 REDIRECT EXAMINATION 52</p> <p>8 Questions by Corrine Youngs</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 (Time noted: 9:26 a m.)</p> <p>2 EMILY MORRIS,</p> <p>3 having been duly sworn to tell the truth, the whole</p> <p>4 truth, and nothing but the truth relating to said</p> <p>5 matter, was examined and testified as follows:</p> <p>6</p> <p>7 DIRECT EXAMINATION,</p> <p>8 QUESTIONS BY CORRINE YOUNGS:</p> <p>9 Q Thank you. Will the witness state her name and</p> <p>10 spell it for the record?</p> <p>11 A Emily Morris, E-m-i-l-y M-o-r-r-i-s.</p> <p>12 Q Now Ms. Morris, have you been deposed before?</p> <p>13 A No.</p> <p>14 Q Okay. So I'm going to lay out a few rules here</p> <p>15 so this deposition can go more smoothly. I'm</p> <p>16 going to ask you a series of questions, and</p> <p>17 these questions concern the facts and incidents</p> <p>18 alleged in this lawsuit. And you're going to</p> <p>19 answer to the best of your ability.</p> <p>20 Do you understand?</p> <p>21 A Yes.</p> <p>22 Q And your answers are under oath; so they must be</p> <p>23 the truth.</p> <p>24 You understand?</p> <p>25 A Yes.</p>

<p style="text-align: right;">Page 6</p> <p>1 Q If at any time you do not understand my 2 question, please say so and I will repeat it or 3 I will rephrase the question. 4 Do you understand? 5 A Yes. 6 Q And as you have been doing, please continue to 7 make verbal responses so that the court reporter 8 can take down the answers. This is especially 9 important given Zoom. 10 Do you understand that? 11 A Yes. 12 Q Okay. If you need a break, please let me know 13 and we can certain take a break, but I ask you 14 finish answering the pending question before we 15 take a break. 16 Do you understand? 17 A Yes, I do. 18 Q Is there any reason you cannot understand my 19 questions today? 20 A No. 21 Q Other than speak with your attorney, is there 22 anything else you did in preparation for today's 23 deposition? 24 A No. 25 MS. YOUNGS: Okay. I'd like to present to</p>	<p style="text-align: right;">Page 8</p> <p>1 Q What was your reaction to this law? 2 A I was very upset because it affects my child and 3 wanted to speak out against it for her sake. 4 Q Were you involved in any way in the passage of 5 this law? 6 A No. 7 Q You did not testify in committee? 8 A Did I? I didn't testify in committee, no. 9 Q Did you write any letters or blog posts about 10 Senate Enrolled Act 480? 11 A No. 12 MS. YOUNGS: I would like to present 13 Exhibit 2, the complaint. 14 THE CONCIERGE: Being introduced now. 15 (Deposition Exhibit 2 marked for 16 identification.) 17 Q Do you recognize this document? 18 MR. FALK: We are not seeing any of the 19 documents. I have the document. 20 MS. YOUNGS: Oh, okay. 21 MR. FALK: I can't imagine there's a 22 different complaint or different deposition 23 notice, but we did not see the documents. 24 THE CONCIERGE: Exhibit 1 seems to still be 25 loading, but Exhibit 2 is in the folder.</p>
<p style="text-align: right;">Page 7</p> <p>1 you Exhibit 1, which is your deposition notice. 2 If the concierge could mark that as 3 Exhibit 1. 4 THE CONCIERGE: That's being introduced 5 now. 6 Is that the declaration? Oh no, I'm sorry. 7 I see here. 8 (Deposition Exhibit 1 marked for 9 identification.) 10 BY MS. YOUNGS 11 Q Do you have that in front of you? 12 A Yes, I do. 13 Q Do you recognize this document? 14 A Yes. 15 Q Is it your understanding you are here in 16 response to this notice today? 17 A Yes. 18 Q Are you familiar with Senate Enrolled Act 480? 19 A Yes, I am. 20 Q How did you hear about this law? 21 A Through the news and through various social 22 media posts regarding the law. 23 Q When was that? 24 A When it was first introduced to the House and 25 Senate.</p>	<p style="text-align: right;">Page 9</p> <p>1 MS. YOUNGS: Do you have the Veritext 2 document share app? 3 MR. FALK: Yeah, let me look. I'm sorry. 4 I assumed it would be on screen as well. 5 THE CONCIERGE: That can be done. Is that 6 what we would like to proceed with? 7 MR. FALK: If you wouldn't mind just so 8 we -- I'm sure it's the same document, but if 9 you wouldn't mind. 10 THE CONCIERGE: Certainly. Bear with me. 11 Exhibit 1 is still being slow. I cant try 12 something else really quick. 13 MR. FALK: Actually, I have it up now. I 14 can show her. 15 MS. YOUNGS: Yeah, Exhibit 2 is in the 16 marked exhibit folder. 17 MR. FALK: Okay. She has it in front of 18 her. 19 BY MS. YOUNGS 20 Q Do you recognize this document? 21 A Yes, I do. 22 Q Are you familiar with its contents? 23 A Yes, I am. 24 Q Did you decide to bring this lawsuit? 25 A Yes.</p>

<p style="text-align: right;">Page 10</p> <p>1 Q Other than your attorney, did you discuss this 2 lawsuit with anyone else as you planned to bring 3 suit? 4 A No. 5 MS. YOUNGS: Then I'd like to present 6 Exhibit 3, the deponent's declaration. 7 THE CONCIERGE: It's being introduced now. 8 (Deposition Exhibit 3 marked for 9 identification.) 10 Q Do you have it in front of you? 11 A Yes, I do. 12 Q Do you recognize this document? 13 A Yes. 14 Q Are you familiar with the statements made in 15 this document? 16 A Yes, I am. 17 Q If you turn to page 6 of the document, that is 18 your signature; correct? 19 A Correct. 20 Q Is there anything in respect to this declaration 21 that you'd like to change or is no longer 22 accurate? 23 A No, I believe it's all correct. 24 Q Okay. Ms. Morris, where do you live? 25 A Indianapolis.</p>	<p style="text-align: right;">Page 12</p> <p>1 the Children's Courtyard. 2 There's quite a lot. So if you need me to 3 stop or pause, let me know. 4 Q Okay. Where -- with regard to Gifted and 5 Talented, what type of institution is that? 6 A It was a preschool. 7 Q Is Parallel also a preschool? 8 A No, that's a substitute staffing program for the 9 IPS District. 10 Q And then Children's Courtyard, is that a 11 preschool? 12 A Yes. 13 Q Where else have you worked? 14 A H & R Block. Applied Marketing. I worked for 15 Instacart. 16 Q Where -- 17 A Oh, go ahead. 18 Q Oh, continue please. 19 A Rainbow Shops, ATC Group Services, Library 20 Restaurant and Pub. Red Lobster, Chilies. 21 Q Are these all within the last 10 years or so, or 22 are we going back all the way to the beginning? 23 A We're going back. The last -- 24 Q What are the most recent? 25 A Most recent? It stopped at Applied Marketing.</p>
<p style="text-align: right;">Page 11</p> <p>1 Q How long have you lived in Indianapolis? 2 A Six and a half years. 3 Q Have you lived elsewhere in Indiana? 4 A Greenwood. 5 Q And how long were you in Greenwood? 6 A Two years -- no, sorry. Four years. 7 Q Okay. Other than Greenwood, have you lived 8 anywhere else in Indiana? 9 A Yes, Paragon, P-a-r-a-g-o-n. 10 Q Okay. And other than Paragon, where else have 11 you lived? 12 A Martinsville. 13 Q Quite a traveler of Indiana. Anywhere else in 14 Indiana? 15 A No. 16 Q Have you lived in any other state other than 17 Indiana? 18 A No. 19 Q Do you work? 20 A Not currently. 21 Q Have you worked previously? 22 A Yes. 23 Q Where have you worked previously? 24 A I have worked at the Gifted and Talented 25 Academy, as well as for Parallel Education, for</p>	<p style="text-align: right;">Page 13</p> <p>1 Q What is Applied Marketing? 2 MR. FALK: Sorry. Was the question what 3 was her most recent job? Because I think she 4 answered -- 5 (Simultaneous conversation.) 6 THE WITNESS: The most recent was Gifted 7 and Talented. 8 BY MS. YOUNGS 9 Q Was Gifted and Talented. Then before that was 10 Parallel? 11 A Yep. 12 Q Before that was Children's Courtyard? 13 A I named in order. 14 Q So most recently Gifted and Talented was a 15 preschool. What was your role at that 16 preschool? 17 A I was the lead teacher for the 3-year-olds. 18 Q How long were you there? 19 A For a month. 20 Q Prior to Gifted and Talented, at Parallel -- 21 what was your role at Parallel? 22 A Substitute teacher. 23 Q What grade? 24 A It varied. Anywhere from pre-K up to 8 was the 25 oldest I worked with.</p>

<p style="text-align: right;">Page 14</p> <p>1 Q How long were you at Parallel?</p> <p>2 A I worked there July to August but also February</p> <p>3 to May of 2022. Through -- yeah, 2022.</p> <p>4 Q Okay. And at Children's Courtyard preschool,</p> <p>5 what was your role at that school?</p> <p>6 A Lead teacher for the 4 and 5-year-olds.</p> <p>7 Q How long were you at Children's Courtyard?</p> <p>8 A From June through August 2022.</p> <p>9 Q And prior to that, you were at H & R Block?</p> <p>10 A Correct.</p> <p>11 Q What was your role at H & R Block?</p> <p>12 A Receptionist.</p> <p>13 Q Are all these organization in Indianapolis?</p> <p>14 A Correct.</p> <p>15 Q Okay. Are you a member of any organizations?</p> <p>16 A No.</p> <p>17 Q Not a member of any political organizations?</p> <p>18 A No, no membership to any political</p> <p>19 organizations.</p> <p>20 Q You're not a member of any transgender related</p> <p>21 organizations?</p> <p>22 A Just Facebook groups.</p> <p>23 Q Okay. What is your sexual orientation?</p> <p>24 A Pansexual.</p> <p>25 Q What does that mean?</p>	<p style="text-align: right;">Page 16</p> <p>1 A Three.</p> <p>2 Q And what are their ages?</p> <p>3 A 15, 11, 8.</p> <p>4 Q And what are their genders?</p> <p>5 A They are all girls.</p> <p>6 Q Do your children identify as a particular sexual</p> <p>7 orientation?</p> <p>8 MR. FALK: I'm going to object. I don't</p> <p>9 know what it means to ask if a 8-year-old has a</p> <p>10 particular sexual orientation. And we're</p> <p>11 talking about A.M. here, who is the 11-year-old,</p> <p>12 and I simply don't think it's relevant to discus</p> <p>13 the other children. Again, this seems to be a</p> <p>14 gross invasion of privacy.</p> <p>15 A I will agree. I'm not going to answer that. My</p> <p>16 8-year-old does not have a sexual orientation as</p> <p>17 she has not experienced sexual attraction at</p> <p>18 8 years old.</p> <p>19 Q Do they identify as transgender?</p> <p>20 A A.M. does and my youngest as well.</p> <p>21 Q Are you married?</p> <p>22 A No.</p> <p>23 Q Have you been married?</p> <p>24 A Yes.</p> <p>25 Q When were you married?</p>
<p style="text-align: right;">Page 15</p> <p>1 MR. FALK: I'm going to interpose an</p> <p>2 objection because that has absolutely nothing to</p> <p>3 do with this case whatsoever. And the witness</p> <p>4 is free to answer, but this is not a case about</p> <p>5 her sexual orientation.</p> <p>6 You can answer.</p> <p>7 THE WITNESS: I feel okay with answering.</p> <p>8 A It means I'm attracted to someone regardless of</p> <p>9 gender.</p> <p>10 Q Okay. What pronouns do you use with that?</p> <p>11 (Audio distortion.)</p> <p>12 (The reporter requested clarification.)</p> <p>13 A He/they.</p> <p>14 Q At what point did you identify as pansexual?</p> <p>15 MR. FALK: Again, I'm going to continue to</p> <p>16 object. And I'm going to, at some point in the</p> <p>17 near future, instruct the client not to respond</p> <p>18 to these questions because this case has nothing</p> <p>19 to do with her sexual orientation. And this is</p> <p>20 a gross invasion of privacy that you would not</p> <p>21 be asking if her first answer to the question</p> <p>22 was she was heterosexual.</p> <p>23 But you can answer.</p> <p>24 A High school when I was 14.</p> <p>25 Q How many children do you have?</p>	<p style="text-align: right;">Page 17</p> <p>1 A To my first husband in 2008, and to my second</p> <p>2 husband in 2013. I divorced from my first</p> <p>3 husband officially in 2010. And for my second</p> <p>4 husband, it was granted in 2019.</p> <p>5 Q Is your second husband A.M.'s father?</p> <p>6 A Yes, he is.</p> <p>7 Q Do you live with any other family?</p> <p>8 A No, I do not.</p> <p>9 Q Just your children live with you?</p> <p>10 A A.M. and my youngest live with me, yes.</p> <p>11 Q Do you have any other family close by?</p> <p>12 A They are all within an hour, hour and a half</p> <p>13 distance.</p> <p>14 Q Is A.M.'s father at all involved in A.M.'s life?</p> <p>15 A He is not.</p> <p>16 Q When's the last time A.M. has seen her father?</p> <p>17 A 2018.</p> <p>18 Q Has A.M.'s father lost custody?</p> <p>19 A Yes, he has.</p> <p>20 Q Can you explain the reason of loss of custody?</p> <p>21 MR. FALK: I'm going to object. This is</p> <p>22 ridiculous. This is not a family matter, a</p> <p>23 custody issue. This is an issue concerning the</p> <p>24 child and I object. This is not relevant.</p> <p>25 You can certainly answer briefly since it's</p>

<p style="text-align: right;">Page 18</p> <p>1 in the medical records. But this has noting to</p> <p>2 do with our case.</p> <p>3 A I will give a brief answer to that. He was</p> <p>4 extremely abusive. I will not go into detail</p> <p>5 for A.M.'s sake.</p> <p>6 Q How old is A.M.?</p> <p>7 A 11 years old.</p> <p>8 Q And what was A.M.'s sex at birth?</p> <p>9 A Male.</p> <p>10 Q And what does A.M. identify as now?</p> <p>11 A Trans girl.</p> <p>12 Q How long has A.M. lived in this -- has lived as</p> <p>13 a trans girl?</p> <p>14 A Since she was 3 1/2 years old.</p> <p>15 Q Has A.M. changed the marker on A.M.'s birth</p> <p>16 certificate?</p> <p>17 A Yes.</p> <p>18 Q And when did this happen?</p> <p>19 A In 2021 it was granted. I believe in September</p> <p>20 of 2021.</p> <p>21 Q Where does A.M. attend school?</p> <p>22 (Audio distortion.)</p> <p>23 (Discussion re: technical difficulty.)</p> <p>24 A A.M. is homeschooled as of April of 2023.</p> <p>25 Q Prior to homeschool, where did A.M. attend?</p>	<p style="text-align: right;">Page 20</p> <p>1 Q In the past several years -- I mean, since A.M.</p> <p>2 was born, has A.M. had any big changes or</p> <p>3 stressful situations?</p> <p>4 A Yes.</p> <p>5 Q What were those situations?</p> <p>6 A As previously stated, abuse from her father,</p> <p>7 death of pets, and recent eviction in September</p> <p>8 of 2022.</p> <p>9 Q How long did the abuse last?</p> <p>10 A From 2015 until he was forced from the home in</p> <p>11 2018. So for three years.</p> <p>12 Q How old was A.M. during this time?</p> <p>13 A It started when she was 3 and ended when she was</p> <p>14 6.</p> <p>15 Q Does A.M. use social media?</p> <p>16 A No.</p> <p>17 Q Does A.M. have any transgender friends?</p> <p>18 A Yes.</p> <p>19 Q How many friends?</p> <p>20 A Two.</p> <p>21 Q And how old are those friends?</p> <p>22 A One is 9; the other is 12.</p> <p>23 Q Did these friends identify as transgender before</p> <p>24 or after A.M.?</p> <p>25 A I am unaware because she met them just in the</p>
<p style="text-align: right;">Page 19</p> <p>1 A Kipp, K-i-p-p, Indy.</p> <p>2 Q How long was A.M. at Kipp Indy?</p> <p>3 A From September of 2022 until April of 2023.</p> <p>4 Q Do you homeschool A.M.?</p> <p>5 A Yes.</p> <p>6 Q Why did you decide to homeschool A.M.?</p> <p>7 MR. FALK: I'll object. Again, this has</p> <p>8 nothing to do with our case.</p> <p>9 If you can answer the question -- it's</p> <p>10 allowed in depositions, but this is really,</p> <p>11 really far off view -- go ahead.</p> <p>12 A A.M. has had recent disabilities --</p> <p>13 MR. FALK: Court reporter, the child's</p> <p>14 first name was just used. In this case, the</p> <p>15 child is known as A.M.; so if any of us slip, as</p> <p>16 is very common, please just put the name as A.M.</p> <p>17 A A.M. has physical disabilities that have started</p> <p>18 to come to light as of 2022 and was being</p> <p>19 bullied for her use of a cane and a walker; so</p> <p>20 she felt the need to withdraw from school.</p> <p>21 Q Does A.M. do well in school?</p> <p>22 A Yes.</p> <p>23 Q Do other students, when A.M. was in school, know</p> <p>24 that A.M. was transgender or is transgender?</p> <p>25 A No.</p>	<p style="text-align: right;">Page 21</p> <p>1 past three years.</p> <p>2 Q When did you first have an indication that A.M.</p> <p>3 was suffering in some sort of --</p> <p>4 A So in 2015, shortly before -- or, no, in 2016.</p> <p>5 I apologize.</p> <p>6 Shortly before her 4th birthday, her older</p> <p>7 sister brought her to me because she had</p> <p>8 confided in her older sister that she wished to</p> <p>9 cut her penis off because girls can't have</p> <p>10 penises and she's a girl.</p> <p>11 Q Were there other symptoms besides these</p> <p>12 statements?</p> <p>13 A Aside from preferring feminine clothing and toys</p> <p>14 that are generally gendered for girls by</p> <p>15 society, no.</p> <p>16 Q What was A.M.'s general emotional and behavioral</p> <p>17 state at this time?</p> <p>18 A She seems withdrawn. I wasn't sure why, and</p> <p>19 seemed not as bubbly as she used to be.</p> <p>20 Q Did A.M. seem anxious?</p> <p>21 A Yes.</p> <p>22 Q Did A.M. have difficulties in social situations?</p> <p>23 A No.</p> <p>24 Q Did you ever suspect A.M. might be autistic?</p> <p>25 A Yes.</p>

<p style="text-align: right;">Page 22</p> <p>1 Q Did you have A.M. tested for autism?</p> <p>2 A We are on the waitlist. We have had issues with</p> <p>3 that due to insurance.</p> <p>4 Q Have you sought counseling for A.M. for issues</p> <p>5 other than gender dysphoria before seeking help</p> <p>6 for gender dysphoria?</p> <p>7 A They were sought at the same time.</p> <p>8 Q What were the other conditions you were seeking</p> <p>9 help with treating?</p> <p>10 A Depression and PTSD as well as anxiety.</p> <p>11 Q Did the depression and anxiety and PTSD arise at</p> <p>12 the same time?</p> <p>13 A The depression and anxiety did, but not the</p> <p>14 PTSD.</p> <p>15 Q The PTSD occurred before the 3 1/2?</p> <p>16 A No. PTSD occurred afterwards due to the abuse</p> <p>17 when she was 6.</p> <p>18 Q Okay. But the depression/anxiety occurred about</p> <p>19 the same time as gender dysphoria?</p> <p>20 A Yes.</p> <p>21 Q So how long did A.M. act this way before you</p> <p>22 sought medical attention?</p> <p>23 A Medical attention was sought when she was 6, but</p> <p>24 she had acted that way at about 3 1/2, 4 years</p> <p>25 old when she came out to me and her sister.</p>	<p style="text-align: right;">Page 24</p> <p>1 A It started with her choice to get a more</p> <p>2 feminine wardrobe, grow her hair out, and choose</p> <p>3 a feminine name; as well as tell her at-the-time</p> <p>4 speech and occupational therapist that she was a</p> <p>5 girl and asked to be addressed as a girl, and to</p> <p>6 tell family members that she was a girl.</p> <p>7 Q Okay. So during this time, A.M. also went to</p> <p>8 see an occupational therapist?</p> <p>9 A Yes.</p> <p>10 Q What was that for?</p> <p>11 A Sensory processing disorder.</p> <p>12 Q What age between 3 1/2 and 6 were these</p> <p>13 therapies started?</p> <p>14 A Started at 2 and went until 5.</p> <p>15 Q What is this disorder?</p> <p>16 A Sensory processing disorder deals with aversions</p> <p>17 and stress occurring due to different sensory</p> <p>18 related events such as texture, food, and sound.</p> <p>19 Q Do these stresses go away at about 5 years old</p> <p>20 then?</p> <p>21 A No. She was able to handle the events and used</p> <p>22 coping skills in those situations to where they</p> <p>23 no longer caused issues for functioning.</p> <p>24 Q Where did A.M. seek medical treatment?</p> <p>25 A I have forgotten the name of that place. It is</p>
<p style="text-align: right;">Page 23</p> <p>1 Q When did A.M. come out?</p> <p>2 A 3 1/2.</p> <p>3 Q And when you say coming out, that is the</p> <p>4 instance where A.M. wanted to cut off her penis</p> <p>5 and said "I want to be a girl"?</p> <p>6 A She stated she is a girl.</p> <p>7 Q Is a girl. Okay.</p> <p>8 A But, yes.</p> <p>9 Q And then you sought medical attention at 6?</p> <p>10 A Yes, she socially transitioned prior.</p> <p>11 Q When did A.M. socially transition?</p> <p>12 A 3 1/2.</p> <p>13 Q The social transition and coming out are the</p> <p>14 exact same instance?</p> <p>15 A Yes.</p> <p>16 Q Have you ever considered that these behaviors of</p> <p>17 A.M. at 3 1/2 are something other than gender</p> <p>18 dysphoria?</p> <p>19 A No.</p> <p>20 Q Who decided that A.M. socially transition?</p> <p>21 A A.M.</p> <p>22 Q Okay. And you agreed to the social transition?</p> <p>23 A Yes.</p> <p>24 Q What are the different steps taken between 3 1/2</p> <p>25 is six to socially transition?</p>	<p style="text-align: right;">Page 25</p> <p>1 in Greenwood, Indiana, however.</p> <p>2 Q Okay. And after these therapies, you sought</p> <p>3 medical care for gender dysphoria; correct?</p> <p>4 A Correct.</p> <p>5 Q When was this?</p> <p>6 A This was in 2018. The first place we went to</p> <p>7 was Families First as well as our primary care</p> <p>8 physician.</p> <p>9 Q What did the providers tell you at those</p> <p>10 appointments?</p> <p>11 A To continue allowing her to present as a girl</p> <p>12 and to watch for any signs of it worsening as</p> <p>13 far as wanting to mutilate her body.</p> <p>14 Q Were there any next steps other than that</p> <p>15 follow-up appointments?</p> <p>16 A When the gender clinic was opened at Riley</p> <p>17 Children Hospital, we were placed on the</p> <p>18 waitlist per our doctor's recommendation.</p> <p>19 Q And when was that?</p> <p>20 A I'm trying to recall when we were placed on it</p> <p>21 because we were placed on it when they opened --</p> <p>22 I believe it was in 2017 -- but we weren't seen</p> <p>23 until 2019.</p> <p>24 Q Did the Family First or primary care physicians</p> <p>25 prescribe any medication for A.M.?</p>

<p style="text-align: right;">Page 26</p> <p>1 A No.</p> <p>2 Q So their only advice at that time was to</p> <p>3 socially transition and monitor?</p> <p>4 A Correct.</p> <p>5 Q Did the doctors at Family First or primary care</p> <p>6 perform any tests or evaluations?</p> <p>7 MR. FALK: You mean for gender dysphoria or</p> <p>8 general? One of the doctors is her primary care</p> <p>9 doctor; so, I assume, her primary care doctor</p> <p>10 was performing tests and evaluations on primary</p> <p>11 care doctor things.</p> <p>12 Q Yeah. Like an annual checkup-type visit --</p> <p>13 MR. FALK: Sure. Understood.</p> <p>14 Q Were there any other --</p> <p>15 A I mean, normal medical examinations. The only</p> <p>16 thing to do for gender dysphoria to examine is</p> <p>17 to talk to her and see how she feels with her</p> <p>18 gender and identity. That was the only exam</p> <p>19 that they did.</p> <p>20 Q And then fast forward to 2019, and you were seen</p> <p>21 by Riley Gender Clinic?</p> <p>22 A Correct.</p> <p>23 Q What happened at that appointment?</p> <p>24 A We discussed whether or not she was entering</p> <p>25 precocious puberty, what signs to watch for, and</p>	<p style="text-align: right;">Page 28</p> <p>1 A Yes.</p> <p>2 Q And then your second appointment was virtual?</p> <p>3 A I believe it was just as a check-in. After</p> <p>4 that, we did do physical to see if the signs of</p> <p>5 puberty had manifested.</p> <p>6 Q Okay. Was your next appointment after the</p> <p>7 virtual one an appointment where you were</p> <p>8 suspect of precocious puberty?</p> <p>9 A Yes.</p> <p>10 Q What happened at that appointment?</p> <p>11 A They did a physical evaluation to look for the</p> <p>12 physical signs of precocious puberty and discuss</p> <p>13 our next steps, which would be prescribing the</p> <p>14 Lupron injections.</p> <p>15 Q So did they determine at that appointment that</p> <p>16 there was precocious puberty?</p> <p>17 A Yes.</p> <p>18 Q And did they prescribe the Lupron at that</p> <p>19 appointment?</p> <p>20 A First, we did the bone density scans and then</p> <p>21 prescribed the Lupron injection.</p> <p>22 Q Why did they do bone density scans?</p> <p>23 A They do it to track growth to make sure the</p> <p>24 Lupron is working. They have to have a</p> <p>25 beginning scan to compare it to later scans.</p>
<p style="text-align: right;">Page 27</p> <p>1 to learn what we would need to do once she began</p> <p>2 precocious puberty in order to stall going</p> <p>3 through male puberty.</p> <p>4 Q What were the signs you were watching for?</p> <p>5 A Whether her testicle had dropped, increased body</p> <p>6 odor, as well as the start of body hair forming</p> <p>7 in the pubic region.</p> <p>8 Q Was there any other advice given at this</p> <p>9 appointment?</p> <p>10 A To continue therapy.</p> <p>11 Q Did you schedule any follow-up appointments?</p> <p>12 A Yes.</p> <p>13 Q When was this? When was the follow-up</p> <p>14 appointment after this first visit?</p> <p>15 A I believe virtually in 2020. Or was it 2021?</p> <p>16 The pandemic caused an issue with the</p> <p>17 appointment. So, unfortunately, I don't</p> <p>18 remember off the top of my head. I do know it</p> <p>19 caused us to pause because they weren't doing</p> <p>20 any appointments for a while during the</p> <p>21 pandemic; so it lengthened the time in between</p> <p>22 the appointments.</p> <p>23 Q Okay. Yeah, the pandemic really messed</p> <p>24 everything up. Was your first appointment in</p> <p>25 person?</p>	<p style="text-align: right;">Page 29</p> <p>1 Q To ensure that A.M. is still growing over this</p> <p>2 time?</p> <p>3 A Yes. To see how her growth is developing while</p> <p>4 on the Lupron.</p> <p>5 Q At what appointment was A.M. diagnosed with</p> <p>6 gender dysphoria?</p> <p>7 A That was --</p> <p>8 MR. FALK: I guess I'm going to, just, not</p> <p>9 objection but, she will testify, the diagnosis</p> <p>10 came long before she went to Riley. I don't</p> <p>11 know if you were asking what appointment at</p> <p>12 Riley or when she was diagnosed.</p> <p>13 Q Okay. So was that at --</p> <p>14 (Simultaneous conversation.)</p> <p>15 A -- primary.</p> <p>16 MR. FALK: Let her ask the question.</p> <p>17 Q So the diagnosis of gender dysphoria happened at</p> <p>18 the primary care --</p> <p>19 A Yes.</p> <p>20 Q -- physician? Was A.M. diagnosed with any other</p> <p>21 conditions at IU Riley?</p> <p>22 A No.</p> <p>23 Q Was A.M. diagnosed with any other conditions at</p> <p>24 the primary care physician?</p> <p>25 A Depression/anxiety.</p>

<p style="text-align: right;">Page 30</p> <p>1 Q The depression/anxiety, were those diagnosed 2 before the gender dysphoria at other 3 appointments? 4 A No. 5 Q So the depression/anxiety were diagnosed at the 6 exact same appointments as the gender dysphoria? 7 A Yes. 8 Q What was the treatment plan for the 9 depression/anxiety? 10 A They recommended to -- at the time, because she 11 was so young, they didn't quite want her in 12 therapy because they didn't know if it would 13 help her; but if it worsened, to seek therapy. 14 They felt that allowing her to socially 15 transition would help with that. 16 Q Was PTSD also treated at that appointment? 17 A No. 18 Q Was PTSD treated prior to that appointment? 19 A No. 20 Q At what point was the PTSD treated? 21 A 2019. 22 Q Who diagnosed the PTSD? 23 A Our therapist at Families First. 24 Q Which was around the same time as the primary 25 care physician appointment?</p>	<p style="text-align: right;">Page 32</p> <p>1 A They did an evaluation of her mental state as 2 far as whether or not she had a plan for harming 3 herself and a plan for attempting suicide. And 4 they tried to find a bed for her within the 5 state, but there were no beds for inpatient. 6 We created a safety plan for at home and 7 school to keep her safe from harm until we were 8 able to get into Eskenazi. 9 Q What was the date of the emergency room visit? 10 A I don't recall the exact date. 11 Q Okay. But it was in 2018? 12 A Correct. 13 MR. FALK: The witness testified it was in 14 August of 2018. 15 Q Did the providers indicate that 16 depression/anxiety were a result of gender 17 dysphoria? 18 A That was one of the reasons, yes. 19 Q What were the other reasons for 20 depression/anxiety? 21 A The abuse that she had gone through with her 22 father. 23 Q Was A.M. prescribed any meditation for 24 anxiety/depression? 25 A At Riley, no, but at Eskenazi, yes.</p>
<p style="text-align: right;">Page 31</p> <p>1 A Primary, regarding which things? The dysphoria 2 or the depression? No, dysphoria was diagnosed 3 at the primary before 2017. 4 Q So the Family First happened after the primary 5 care physician? 6 A Correct. 7 Q Did the Family First recommend therapy for the 8 PTSD? 9 A Yes. They offered those services for her. 10 Q How long has A.M. stopped therapy at Family 11 Frist? 12 A She stopped at -- she started in May of 2018 and 13 stopped in August. 14 Q Of 2018? 15 A Yes, sorry. 16 Q Were those services sought by another provider? 17 A We stopped them because we felt they weren't 18 enough and then sought treatment -- emergency 19 treatment at Riley emergency room due to 20 suicidal ideation. And they recommended 21 Eskenazi Midtown Clinic, which is where we 22 sought further treatment. 23 Q When did that treatment begin at Eskenazi? 24 A I believe that was all in August of 2018. 25 Q What happened at the Riley emergency room visit?</p>	<p style="text-align: right;">Page 33</p> <p>1 Q Through the therapy at Eskenazi? 2 A Yes. 3 Q What was A.M. prescribed? 4 A The first medication, I believe, was Zoloft. 5 Q How long was A.M. on Zoloft? 6 A I can't remember the exact time frame. I know 7 it was at least six months. 8 Q Why was A.M. taken off Zoloft? 9 A It increased her anger and irritability. 10 Q Was A.M. prescribed something else instead? 11 A Yes, Prozac. 12 Q How long was A.M. on Prozac? 13 A She is still currently on Prozac. 14 Q And Prozac was prescribed in 2019? 15 A Correct. 16 Q Has A.M. been prescribed any other medication 17 for depression/anxiety? 18 A I know there was one at the time of Zoloft that 19 helped with her difficulty sleeping and 20 nightmares, but I cannot recall the name off the 21 top of my head. But she is no longer on it. 22 Q Why was A.M. taken off of that? 23 A It was making her extremely drowsy in the 24 mornings and having difficulty paying attention 25 in school.</p>

<p style="text-align: right;">Page 34</p> <p>1 Q How long was A.M. on that medication?</p> <p>2 A I believe -- I want to say she stopped taking it</p> <p>3 in 2020 if I'm remembering correctly.</p> <p>4 Q Was that sleeping medication prescribed the same</p> <p>5 time as Zolof? </p> <p>6 A Yes.</p> <p>7 Q When did you first learn about the puberty</p> <p>8 blockers?</p> <p>9 A That was in 2015.</p> <p>10 Q Did you learn about those on your own?</p> <p>11 A No. I attended a support group for parents and</p> <p>12 family of transgender children.</p> <p>13 Q But the support group was for a different child,</p> <p>14 not A.M.?</p> <p>15 A It was for A.M. as well as the older sibling at</p> <p>16 the time.</p> <p>17 Q Was the support group before A.M. had come out?</p> <p>18 A No.</p> <p>19 Q Okay.</p> <p>20 A Yeah, no. It was after.</p> <p>21 Q What was said about puberty blocker?</p> <p>22 A That it helps delay puberty while they -- while</p> <p>23 the parents and children discussed whether or</p> <p>24 not they wanted to go on either testosterone or</p> <p>25 estrogen after, when they did begin puberty. It</p>	<p style="text-align: right;">Page 36</p> <p>1 it.</p> <p>2 Q So when was A.M. prescribed puberty blockers?</p> <p>3 A In August of 2021.</p> <p>4 Q And when did A.M. start taking them?</p> <p>5 A In August of 2021.</p> <p>6 Q And how are these taken?</p> <p>7 A Through injection at the doctor's office at</p> <p>8 Riley.</p> <p>9 Q How frequently do the injections occur?</p> <p>10 A Every three months.</p> <p>11 Q How many times has the puberty blockers been</p> <p>12 administered?</p> <p>13 A I would have to do the math, but there were some</p> <p>14 times where we had delay due to insurance</p> <p>15 issues; so I'm not quite sure.</p> <p>16 Because it's been a little less than two</p> <p>17 years, and it was every three months. So at the</p> <p>18 very least, she's had it four if not five times.</p> <p>19 Q So A.M. has taken the puberty blockers every</p> <p>20 three months since August on 2021?</p> <p>21 A Yes. And about five, maybe six because there</p> <p>22 were some periods where we had issues with</p> <p>23 insurance that caused a laps in getting them on</p> <p>24 schedule.</p> <p>25 Q What were you told by your physician about the</p>
<p style="text-align: right;">Page 35</p> <p>1 helped stall puberty with precocious puberty, as</p> <p>2 well as gave them some time to decide what was</p> <p>3 the next best step for that child.</p> <p>4 Q With your appointments with A.M. for gender</p> <p>5 dysphoria, when were puberty blockers mentioned</p> <p>6 as a potential treatment?</p> <p>7 A After I learned about it in 2015, I just -- and</p> <p>8 so it would be during our first visit discussing</p> <p>9 it with the doctor, officially, in 2017 because</p> <p>10 I started noticing body odor. And so we</p> <p>11 discussed whether or not, in the future, we</p> <p>12 would try those -- if they felt that that would</p> <p>13 help since her dysphoria was increasing as she</p> <p>14 got older.</p> <p>15 Q And then 2017 appointment was the -- where was</p> <p>16 this appointment at?</p> <p>17 A At the Franciscan Family Medical Group.</p> <p>18 Q And that Franciscan Family Medical Group is the</p> <p>19 primary care physician?</p> <p>20 A Correct.</p> <p>21 Q At that appointment, the primary care mentioned</p> <p>22 that puberty blockers were not -- were not --</p> <p>23 the physician mentioned it was not a good time</p> <p>24 for A.M. to take puberty blockers?</p> <p>25 A Correct. She wasn't old enough for her to need</p>	<p style="text-align: right;">Page 37</p> <p>1 short-term effects of the puberty blockers?</p> <p>2 A It would delay the growth of body hair, voice</p> <p>3 change, any onset of more masculine features as</p> <p>4 far as voice and developing tissue in the pubic</p> <p>5 region and body hair.</p> <p>6 Q Were there any long-term effects of puberty</p> <p>7 blockers shared with you?</p> <p>8 A I mean, it would continue so long as she was on</p> <p>9 them. But if she stopped taking them, she would</p> <p>10 start puberty.</p> <p>11 Q Were there any medical risks of taking puberty</p> <p>12 blockers shared with you?</p> <p>13 A I'm sure there were, as there is with any</p> <p>14 medication a child starts; but, again, since</p> <p>15 it's been two years, off the top of my head, I</p> <p>16 cannot recall.</p> <p>17 Q Does A.M. experience any side effects from</p> <p>18 taking the puberty blockers?</p> <p>19 A No. She has had a very good experience with</p> <p>20 them.</p> <p>21 Q And who decided to take the puberty blockers?</p> <p>22 A A.M. made the decision after discussing it with</p> <p>23 me and her physician.</p> <p>24 Q And you consented to the puberty blockers?</p> <p>25 A Correct.</p>

<p style="text-align: right;">Page 38</p> <p>1 Q Were you offered any alternative course of 2 treatment besides puberty blockers? 3 A The only alternative would be go without them. 4 Q Was that ever suggested to you by the physician? 5 A No, because the physician felt that in order to 6 help A.M.'s dysphoria not increase, that the 7 puberty blockers would be necessary. 8 Q Okay. What do you know about cross-sex 9 hormones? 10 A I know that when given either estrogen or 11 testosterone, you develop the characteristics 12 that come along side those. 13 So for estrogen, it would be a more 14 feminine voice, the Adam's apple would not 15 become more prominent, the hips would develop in 16 a way that is associated more with having a 17 feminine body, and breast tissue would develop 18 as well. As well as feminine facial features; a 19 more feminine looking face. 20 Q Where did you first learn about cross-sex 21 hormones? 22 A Again, at the support group for the transgender 23 families. 24 Q What's the name of the support group? 25 A GEKCO. How do they spell it? Do you recall?</p>	<p style="text-align: right;">Page 40</p> <p>1 would affect her body, that it would need to 2 happen towards a more normal age of puberty, 3 after we had stalled the precocious puberty to 4 give her body time to be ready for it. 5 Q And has A.M. been prescribed cross-sex hormones? 6 A Not yet. We decided it would be at least 7 2 years after being on Lupron. 8 Q And it's almost been 2 years that A.M. has been 9 on Lupron? 10 A Correct. 11 Q So at the 2 years mark, what hormones exactly 12 are you planning? 13 A Estrogen. 14 Q Are there any other hormones? 15 A I'm not sure. We're going to have a more 16 thorough discussion before taking that step. At 17 her next appointment, we'll have that 18 discussion. 19 Q When is the next appointment? 20 A I believe May 31. I know it's at the end of 21 this month. 22 MS. YOUNGS: Do you mind if we take a break 23 for a minute? 24 (A recess was taken between 10:23 a.m. and 25 10:30 a.m.)</p>
<p style="text-align: right;">Page 39</p> <p>1 Because it's different than the actual animal. 2 Is it G-E-C-K-O? I can't recall how they 3 spell it because it's slightly different. 4 Because it's an acronym. It's not the actual 5 animal. 6 MS. PACTOR: Corrine, can we go off the 7 record? 8 (Off the record.) 9 BY MS. YOUNGS 10 Q Are you still a member of this support group? 11 A Online, yes, because we stopped doing in-person 12 due to the pandemic and also with my own 13 immunocompromised issues. 14 Q And by online, is this through their website or 15 Facebook? 16 A Both. 17 Q When was the first instance that doctors -- or 18 have doctors discussed with you cross-sex 19 hormones? 20 A We discussed it with our primary physician when 21 I brought up needing a referral to Riley when 22 their clinic opened. 23 Q What did this physician tell you about cross-sex 24 hormones? 25 A The same thing that I told you about how they</p>	<p style="text-align: right;">Page 41</p> <p>1 BY MS. YOUNGS 2 Q Were you provided informed consent for the 3 puberty blockers? 4 A Informed consent forms to sign off on them, yes. 5 Q And these were just forms? 6 A I was given pamphlets to know more about them. 7 Q Did you learn anything from pamphlets? 8 A No, because I had already done my own personal 9 research on them before making the decision with 10 the doctor to go ahead with them. 11 Q Did the doctor discuss with you anything else 12 along with the pamphlets? 13 A Just the general information about what to 14 expect with them, how it would affect her, and 15 possible side effects, as we would any other 16 medication. 17 Q Have you received informed consent concerning 18 cross-sex hormones? 19 A Not yet. As I stated, we're going to discuss 20 that at her next appointment. 21 Q Have you consider any cognitive behavior therapy 22 for A.M.? 23 A Can you be -- clarify by what you mean by 24 cognitive behavior. 25 Q Any other type of therapy such as -- any other</p>

<p style="text-align: right;">Page 42</p> <p>1 therapy other than for depression/anxiety?</p> <p>2 MR. FALK: I guess I'm going to object</p> <p>3 because I think the record already reflects that</p> <p>4 she sought therapy through Eskenazi's mental</p> <p>5 health center for both the dysphoria and PTSD.</p> <p>6 So I think it's already in the record that she</p> <p>7 did seek therapy.</p> <p>8 Q I'm merely asking if there was any other therapy</p> <p>9 considered?</p> <p>10 A I'm not sure what other therapy there would be.</p> <p>11 Q Okay. Have you considered seeing a neurologist?</p> <p>12 MR. FALK: And this is in reference to the</p> <p>13 gender dysphoria? Is that the question?</p> <p>14 MS. YOUNGS: I mean, I'm -- I'm asking</p> <p>15 generally about medical conditions.</p> <p>16 MR. FALK: I guess I will object to the</p> <p>17 extent you are asking about stuff that's outside</p> <p>18 of gender dysphoria.</p> <p>19 However, I think the witness can testify as</p> <p>20 to whether there are other issues requiring --</p> <p>21 excuse me -- potential consultation of a</p> <p>22 neurologist occurring.</p> <p>23 A As for dysphoria, there is no need for</p> <p>24 neurological visit as we have discussed with the</p> <p>25 doctor and therapist, they don't believe there's</p>	<p style="text-align: right;">Page 44</p> <p>1 the treatment for gender dysphoria?</p> <p>2 A No.</p> <p>3 Q What made you feel -- what made you think that</p> <p>4 the benefits outweighed the risks?</p> <p>5 MR. FALK: Again, are we just -- to be</p> <p>6 clear, at this point, the only treatment she is</p> <p>7 receiving is the puberty blockers.</p> <p>8 MS. YOUNGS: Correct.</p> <p>9 MR. FALK: So I assume we're talking about</p> <p>10 that.</p> <p>11 MS. YOUNGS: Correct.</p> <p>12 A Well, I think the risk of medication is nothing</p> <p>13 compared to losing my child to suicide if she</p> <p>14 were to go without or her mutilating herself. I</p> <p>15 think that's a greater risk than any risk she</p> <p>16 would have while on the puberty blockers.</p> <p>17 BY MS. YOUNGS</p> <p>18 Q Tell me more about specific instances of</p> <p>19 suicidality?</p> <p>20 A When she was getting closer to signs of puberty,</p> <p>21 before she started the blockers, she vocalized</p> <p>22 that if she was unable to get them, she did not</p> <p>23 want to live because she could not stand living</p> <p>24 presenting male because it didn't feel right to</p> <p>25 her.</p>
<p style="text-align: right;">Page 43</p> <p>1 a need for that. But she does -- with her</p> <p>2 disabilities, with her legs and walking, there</p> <p>3 is a need for neurology appointment to see</p> <p>4 what's going on with that. But that has nothing</p> <p>5 to do with her dysphoria.</p> <p>6 We do have an appointment with the</p> <p>7 neurologist in July. But, again, that won't be</p> <p>8 pertaining to the dysphoria or anything</p> <p>9 regarding that.</p> <p>10 Q And that's concerning some other medical</p> <p>11 condition?</p> <p>12 A Correct.</p> <p>13 Q What is that medical condition?</p> <p>14 A We don't know. That's why we are seeking a</p> <p>15 neurology appointment.</p> <p>16 Q Okay. Are you considering any transition</p> <p>17 surgeries for A.M.?</p> <p>18 A No, because she is a minor.</p> <p>19 Q Are you considering them for the future?</p> <p>20 A That is entirely up to her because she will be</p> <p>21 an adult.</p> <p>22 Q Okay. So you are not considering any while A.M.</p> <p>23 is a minor?</p> <p>24 A Correct.</p> <p>25 Q Do you feel concerned about the risks of any of</p>	<p style="text-align: right;">Page 45</p> <p>1 When there was a lapse in receiving the</p> <p>2 blockers due to insurance and pharmacy issues,</p> <p>3 her depression and suicidal ideations increased</p> <p>4 because she was anxious that she would not</p> <p>5 receive them. She did vocalize that to me</p> <p>6 because it was worrying her.</p> <p>7 Q Again, what age was that?</p> <p>8 A The most recent was 2022 when there was an issue</p> <p>9 with the insurance.</p> <p>10 Q Has A.M. conveyed any suicidal thoughts since</p> <p>11 being on the puberty blockers besides this last</p> <p>12 instance?</p> <p>13 A No. On the blockers, there has been no increase</p> <p>14 risk of suicide.</p> <p>15 Q How many instances were there prior to the</p> <p>16 puberty blockers?</p> <p>17 MR. FALK: I'm sorry, instances of her</p> <p>18 discussing suicide? Not mutilating --</p> <p>19 MS. YOUNGS: Yes.</p> <p>20 A There were at least four conversations revolving</p> <p>21 around it. No actual attempts were made because</p> <p>22 she did confide in me and talk it out with me.</p> <p>23 Q What were these conversations like?</p> <p>24 A I mean, feeling the desire to end her life</p> <p>25 either by jumping from the roof of our home or</p>

<p style="text-align: right;">Page 46</p> <p>1 injuring herself with knives because she was</p> <p>2 feeling an overwhelming feeling of despair at</p> <p>3 the thought of not being able to live as a girl.</p> <p>4 Q So these were specific moments, not a daily</p> <p>5 routine or a daily --</p> <p>6 A They weren't daily conversations, but she had</p> <p>7 the constant thoughts. And the thoughts were</p> <p>8 overwhelming for her to the point where she</p> <p>9 broke down and then came to me.</p> <p>10 Q Broke down, you mean broke down crying?</p> <p>11 A I mean broke down functioning, not being able to</p> <p>12 do anything. Crying, yes.</p> <p>13 Q Now in regard to the mutilation, how many times</p> <p>14 had that been conveyed?</p> <p>15 A Any time she is not on the blockers, she gets</p> <p>16 the urge. And also due to trauma received from</p> <p>17 her father, that increased it. And so the PTSD</p> <p>18 does tie to increased thoughts of mutilation</p> <p>19 because of one of the forms of abuse that she</p> <p>20 went through. So I can't give an exact number</p> <p>21 because it's been so frequent when she's not on</p> <p>22 blockers.</p> <p>23 Q Oh, when she is not on puberty blockers?</p> <p>24 A Yes. While she is on blockers, she has no</p> <p>25 feelings of wanting to mutilate herself because</p>	<p style="text-align: right;">Page 48</p> <p>1 is her goal.</p> <p>2 Q Oh. So A.M. has conveyed that she would like to</p> <p>3 wait until she's an adult?</p> <p>4 A I mean, she knows that the surgeries are not</p> <p>5 done to children and that it's not safe for her</p> <p>6 to do as a child. It would need to happen when</p> <p>7 she's an adult. So, yes, she has conveyed it</p> <p>8 will happen when she's an adult.</p> <p>9 Q I think I'm reaching the end of my questions</p> <p>10 here.</p> <p>11 Have you told me everything about this case</p> <p>12 that you believe is important?</p> <p>13 MR. FALK: Objection. You can't ask that</p> <p>14 in a deposition. That's not a question. You</p> <p>15 have to ask a question; she has to give the</p> <p>16 answers. It's not her role to volunteer stuff</p> <p>17 that she thinks is important. It's your job to</p> <p>18 ask questions. I will instruct her not to</p> <p>19 answer that because that's an impossible</p> <p>20 question.</p> <p>21 Q Did you understand each question I asked?</p> <p>22 MR. FALK: I'm sorry. We had a fire truck</p> <p>23 drive through.</p> <p>24 MS. YOUNGS: Pardon?</p> <p>25 MR. FALK: Just had a fire truck drive</p>
<p style="text-align: right;">Page 47</p> <p>1 she knows that's not going to give her away due</p> <p>2 to clothing. It's only if -- when she's not on</p> <p>3 the blockers, the anxiety increases; and when</p> <p>4 her anxiety increases, the desire to mutilate</p> <p>5 herself increases.</p> <p>6 (Audio distortion.)</p> <p>7 (The reporter requested clarification.)</p> <p>8 MS. YOUNGS: I think she froze for a</p> <p>9 second. I didn't hear the end of it.</p> <p>10 A I stated when she is not on the blockers, her</p> <p>11 anxiety increases; and when her anxiety</p> <p>12 increases, the desire to mutilate herself</p> <p>13 increases.</p> <p>14 Q With the desire to mutilate herself does she</p> <p>15 also have meltdowns similar to suicide thoughts?</p> <p>16 A Yes, because they become very overwhelming for</p> <p>17 her.</p> <p>18 Q Has the puberty blockers also kept the symptoms</p> <p>19 of odor and hair and such away?</p> <p>20 A She still has to use deodorant, but it's not as</p> <p>21 overwhelming as it would be without it. And she</p> <p>22 hasn't developed any pubic hair or armpit hair.</p> <p>23 Q Has A.M. conveyed that she would like to get</p> <p>24 surgery?</p> <p>25 A She has stated that, when she is an adult, that</p>	<p style="text-align: right;">Page 49</p> <p>1 through the office. You'll have to ask the</p> <p>2 question again.</p> <p>3 BY MS. YOUNGS</p> <p>4 Q Did you understand each question I asked today?</p> <p>5 A Other than the ones I asked you clarify on, yes.</p> <p>6 Q Okay. Did you want to change any answers?</p> <p>7 A Aside from when I said I didn't discuss it with</p> <p>8 anyone, I did discuss it with A.M., on the</p> <p>9 things pertaining to puberty blockers,</p> <p>10 dysphoria, things like that and the case. I did</p> <p>11 discuss filing suit with A.M. because it was</p> <p>12 also her decision.</p> <p>13 Q Okay. So when I asked is there anything you did</p> <p>14 in preparation -- which question was that?</p> <p>15 MR. FALK: I think the question you asked</p> <p>16 was did you discuss this with anyone. And what</p> <p>17 she said -- correcting her answer, said -- she</p> <p>18 did discuss it with her daughter because, as she</p> <p>19 told you.</p> <p>20 MS. YOUNGS: Okay. Well, that's all the</p> <p>21 questions I have.</p> <p>22 MR. FALK: Let's take a little break and</p> <p>23 we'll come back.</p> <p>24 (Off the record.)</p> <p>25</p>

<p style="text-align: right;">Page 50</p> <p>1 CROSS-EXAMINATION, 2 QUESTIONS BY KENNETH J. FALK: 3 Q Ms. Morris, just a couple of things. Throughout 4 the deposition, talking about A.M.'s recent 5 biological development, you referred to the fact 6 that she was starting precocious puberty. 7 Was that correct? 8 A Yes. That was in reference to when she first 9 started her Lupron. It was due to precocious 10 puberty. 11 Q At this point, she is showing the signs of her 12 endogenous puberty; is that correct? 13 A Correct. 14 Q I just like to use big words. 15 And throughout the deposition there were 16 discussion about anxiety and depression. 17 Do you remember those discussions? 18 A Yes. 19 Q And has that been a symptom of her gender 20 dysphoria from the very beginning? 21 A Yes. 22 Q So when your primary care physician first 23 discussed that with you, I guess before A.M. was 24 4; is that correct? 25 A Correct.</p>	<p style="text-align: right;">Page 52</p> <p>1 Q Did you feel that you got more information from 2 them than you get from -- in other situations 3 where doctors are discussing with you potential 4 treatment? 5 A It was about the same as I would expect with any 6 doctor's visit: going over treatment, symptoms, 7 what to expect; if I had any worries, to contact 8 them just as I would with any other medical 9 treatment with my children. 10 MR. FALK: I have no further questions. 11 Thank you. 12 REDIRECT EXAMINATION, 13 QUESTIONS BY CORRINE YOUNGS: 14 BY MS. YOUNGS 15 Q I just have one follow-up question from cross. 16 What is this GenderNexus group that was just 17 mentioned? 18 A It's a nonprofit group that helps families and 19 transgender people have access to medical 20 groups, any questions they may have about 21 obtaining legal -- you know, the legal paperwork 22 in the process for name change, as well as being 23 there at doctors appointments as an advocate for 24 the patient to help them understand what's being 25 discussed.</p>
<p style="text-align: right;">Page 51</p> <p>1 Q She was suffering from deposition/anxiety 2 because of the gender dysphoria? 3 A Correct. 4 Q Has that depression/anxiety increased recently 5 with the passage of this statute? 6 A Yes. We're seeing an increase in her anxiety 7 about the lack of access to the medication that 8 she will need to go through puberty as a girl. 9 And so her deposition has also increased. 10 Q You were asked some questions about informed 11 consent. It's my understanding from your 12 response that you received forms and pamphlets 13 about the puberty blockers; is that correct? 14 A Correct. 15 Q And did you have discussions with your medical 16 staff about that as well? 17 A Yes. 18 Q Was it just one medical person or did a number 19 of persons at Riley talk to you about that? 20 A It was a doctor, a nurse, as well as an advocate 21 from the GenderNexus group, which does work with 22 transgender patients. 23 Q So you were able too discuss the benefits and 24 drawbacks? 25 A Yes.</p>	<p style="text-align: right;">Page 53</p> <p>1 Q Is this group contracted with Riley? 2 A I don't know. 3 MS. YOUNGS: Okay. No further questions. 4 MR. FALK: Thank you. We'll take 5 signature. 6 (Time noted: 10:53 a m.) 7 AND FURTHER THE DEPONENT SAITH NOT. 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>

<p style="text-align: right;">Page 54</p> <p>1 STATE OF INDIANA)) SS: 2 COUNTY OF MONROE) 3 I, Colleen Brady, a Notary Public in and for 4 the County of Monroe, State of Indiana at large, do 5 hereby certify that EMILY MORRIS, the deponent 6 herein, was by me first duly sworn to tell the 7 truth, the whole truth, and nothing but the truth 8 in the aforementioned matter; 9 That the foregoing deposition was remotely 10 taken on behalf of the Defendants, with the witness 11 located in Indiana, on the 17th day of May 2023, 12 commencing at the hour of 9:26 a.m., pursuant to 13 the Federal Rules of Civil Procedure; 14 That said deposition was taken down 15 stenographically and transcribed under my direction 16 as accurately as possible, considering the quality 17 of the videoconference communication, and that the 18 typewritten transcript is a true record of the 19 testimony given by the said deponent; and 20 thereafter presented to said deponent for her 21 signature; 22 That the parties were represented by their 23 counsel as aforementioned. 24 I do further certify that I am a disinterested 25 person in this cause of action; that I am not a</p> <p style="text-align: right;">Page 55</p> <p>1 relative or attorney of any party, or otherwise 2 interested in the event of this action, and am not 3 in the employ of the attorneys for any party. 4 IN WITNESS WHEREOF, I have hereunto set my 5 hand and affixed my seal on this, 24th 6 day of May 2023 <i>Colleen Brady</i> 7 8 <u>Colleen Brady</u> 9 10 11 Seal, Notary Public My Commission Expires: State of Indiana March 8, 2029 12 13 Colleen Brady County of Residence: Commission No. NP0732235 Monroe 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 56</p> <p>1 Veritext Legal Solutions 1100 Superior Ave 2 Suite 1820 Cleveland, Ohio 44114 3 Phone: 216-523-1313 4 May 24, 2023 5 To: Mr. Falk 6 Case Name: K.C., Et Al. v. The Individual Members Of The Medical 7 Licensing Board Of Indiana, Et Al. 8 Veritext Reference Number: 5915520 9 Witness: Emily Morris Deposition Date: 5/17/2023 10 Dear Sir/Madam: 11 12 Enclosed please find a deposition transcript. Please have the witness 13 review the transcript and note any changes or corrections on the 14 included errata sheet, indicating the page, line number, change, and 15 the reason for the change. Have the witness' signature notarized and 16 forward the completed page(s) back to us at the Production address shown 17 above, or email to production-midwest@veritext.com. 18 19 If the errata is not returned within thirty days of your receipt of 20 this letter, the reading and signing will be deemed waived. 21 Sincerely, 22 Production Department 23 24 25 NO NOTARY REQUIRED IN CA</p> <p style="text-align: right;">Page 57</p> <p>1 DEPOSITION REVIEW CERTIFICATION OF WITNESS 2 3 ASSIGNMENT REFERENCE NO: 5915520 CASE NAME: K.C., Et Al v. The Individual Members Of The Medical Licensing Board Of Indiana, Et Al 4 DATE OF DEPOSITION: 5/17/2023 WITNESS' NAME: Emily Morris 5 In accordance with the Rules of Civil Procedure, I have read the entire transcript of 6 my testimony or it has been read to me 7 I have made no changes to the testimony as transcribed by the court reporter 8 9 Date Emily Morris 10 Sworn to and subscribed before me, a Notary Public in and for the State and County, 11 the referenced witness did personally appear and acknowledge that: 12 They have read the transcript; 13 They signed the foregoing Sworn Statement; and 14 Their execution of this Statement is of their free act and deed 15 I have affixed my name and official seal 16 this ____ day of _____, 20____ 17 18 Notary Public 19 Commission Expiration Date 20 21 22 23 24 25</p>
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<p>1 DEPOSITION REVIEW CERTIFICATION OF WITNESS</p> <p>2</p> <p>3 ASSIGNMENT REFERENCE NO: 5915520 CASE NAME: K C , Et Al v The Individual Members Of The Medical Licensing Board Of Indiana, Et Al DATE OF DEPOSITION: 5/17/2023 WITNESS' NAME: Emily Morris</p> <p>4 In accordance with the Rules of Civil Procedure, I have read the entire transcript of my testimony or it has been read to me</p> <p>5 I have listed my changes on the attached Errata Sheet, listing page and line numbers as well as the reason(s) for the change(s)</p> <p>6 I request that these changes be entered as part of the record of my testimony</p> <p>7</p> <p>8 I have executed the Errata Sheet, as well as this Certificate, and request and authorize that both be appended to the transcript of my testimony and be incorporated therein</p> <p>9 _____ Date Emily Morris</p> <p>10</p> <p>11 Sworn to and subscribed before me, a Notary Public in and for the State and County, the referenced witness did personally appear and acknowledge that:</p> <p>12 They have read the transcript; They have listed all of their corrections in the appended Errata Sheet; They signed the foregoing Sworn Statement; and Their execution of this Statement is of their free act and deed</p> <p>13 I have affixed my name and official seal this _____ day of _____, 20 _____</p> <p>14 _____ Notary Public</p> <p>15 _____ Commission Expiration Date</p>	Page 58
<p>1 ERRATA SHEET VERITEXT LEGAL SOLUTIONS MIDWEST</p> <p>2 ASSIGNMENT NO: 5915520</p> <p>3 PAGE/LINE(S) / CHANGE /REASON</p> <p>4 _____</p> <p>5 _____</p> <p>6 _____</p> <p>7 _____</p> <p>8 _____</p> <p>9 _____</p> <p>10 _____</p> <p>11 _____</p> <p>12 _____</p> <p>13 _____</p> <p>14 _____</p> <p>15 _____</p> <p>16 _____</p> <p>17 _____</p> <p>18 _____</p> <p>19 _____</p> <p>20 _____ Date Emily Morris</p> <p>21 SUBSCRIBED AND SWORN TO BEFORE ME THIS _____</p> <p>22 DAY OF _____, 20 _____.</p> <p>23 _____ Notary Public</p> <p>24 _____</p> <p>25 _____ Commission Expiration Date</p>	Page 59

[& - a.m.]

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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